# Office to Monitor and Combat Trafficking in Persons

**Guidelines for Submitting Full Project Proposals** 

August 1, 2020

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# **Purpose of Guidelines**

These guidelines are intended to support organizations in preparing proposed project documents for consideration for funding. Applicants should review the funding opportunity, required application templates, and the following guidelines on preparing applications.

#### Online Forms: Standard Forms 424, 424A, and 424B

There are three mandatory application forms that must be completed through SAMS Domestic (https://mygrants.service-now.com/grants):

- SF-424 (Application for Federal Assistance)
- SF-424A (Budget Information for Non-Construction programs)
- SF-424B (Assurances for Non-Construction programs)

When completing these forms, please use the below guidance to fill in all fields except where noted as "Leave Blank".

#### **SF-424** (Application for Federal Assistance)

- 1. **Type of Submission:** Application
- 2. **Type of Application:** New
- 3. **Date Received:** This will be assigned automatically.
- 4. **Applicant Identifier:** Leave blank.
- 5a. Federal Entity Identifier: Leave blank.
- 5b. Federal Award Identifier: Leave blank.
- 6. **Date Received by State:** Leave blank. This will be assigned automatically.
- 7. **State Application Identified:** Leave blank. This will be assigned automatically.
- 8a. Enter the legal name of the applicant organization. Do <u>NOT</u> list abbreviations or acronyms unless they are part of the organization's *legal* name.
- 8b. **Employer/Taxpayer ID Number:** Non-U.S. organizations enter 44-444444
- 8c. Enter organizational Unique Entity Identifier number (UEI).

Organizations can request a UEI number at: <a href="http://fedgov.dnb.com/webform">http://fedgov.dnb.com/webform</a>. Enter "0000000000" for organizations that do not yet have a UEI number.

- 8d. Enter the headquarters address of the applicant
- 8e. Enter the name of the primary organizational unit (and department or division) that will undertake the assistance activity as applicable.
- 8f. Enter the name, title, and all contact information of the person to be contacted on matters involving this application.
- 9. **Select an applicant type** (type of organization)
- 10. Enter: Office to Monitor and Combat Trafficking in Persons
- 11. **Enter:** 19.019. This should be automatically entered.
- 12. **Enter the Funding Opportunity Number and title.** This number will already be entered on electronic applications.

- 13. **Enter the Competition Identification Number and title.** This number will already be entered on electronic applications.
- 14. Areas Affected by Project: Enter country or region.
- 15. Enter the title of proposed project: Enter project title.
- 16. (16a) **Congressional districts of Applicant:** Applicants based in the U.S. should enter congressional district. Foreign applicants should enter "90." 16(b) All applicants should enter "90."
- 17. Enter start date February 1, 2020 and projected end date.
- 18. (18a) Enter the **amount requested** for the project described in the full proposal under "Federal"; (18b) enter any cost-share under "Applicant." If not proposing cost-share, enter zeros.
- 19. **Select "c.** Program is not covered by E.O 12372."
- 20. **Select the appropriate box.** If the answer is "yes" to this question, provide an explanation.
- 21. Enter the name, title, and all contact information of the **individual** authorized to sign for the application on behalf of the applicant organization.

# SF-424A –Applicants often say this form is confusing. Please review the detailed instructions below <u>BEFORE</u> completing this form online.

#### Section A - Budget Summary - Complete Tab 1

- a. **Enter:** Anti-Trafficking Program (This is the only grant program that needs to be entered). Click Save to refresh the page.
- b. Click the Anti-Trafficking Program link and **enter:** 19.019.
- c-d. Leave these fields blank.
- e. Enter the amount of federal funds requested for this project.
- f. Enter the **amount of any other funds the applicant will receive** towards this project.
- g. The **total cost** of this project will automatically be calculated. Click Save & Return
- Section B Budget Categories Complete Tab 2 Enter total project costs in each category in Column 1 as described below. In Column 5 the form should automatically show the sum. Columns 2, 3, and 4 leave blank.
- a-h. Click into each category to enter the amount for **each object class category** (Include cost sharing).
- i. Enter the sum of 6a-6h.
- j. Enter any indirect charges.
- k. Enter the sum of 6i and 6j.

Program Income. Enter any program income that will be earned as a result of the project. If none, leave this section blank.

# **Section C - Non-Federal Resources – Complete Tab 3** – (Only complete this section if the proposal includes funds from other sources)

- 1. Click into Anti-Trafficking Program.
- 2. Enter **cost share** amount in the Applicant field, if applicable.
- 3. Leave the State field **blank**.
- 4. Enter the amount of any **other funding sources** for this project.
- 5. The **total amount for all non-federal resources** should automatically be calculated.

#### Section D - Forecasted Cash Needs - Complete Tab 4

- 1. In the first column, enter the <u>total</u> amount of **federal funds** requested for the project. Forecasted cash needs by quarter are not required.
- 2. In the first column, enter the total amount of **non-federal funds** you expect to expend during the project. Please list total cost share in this column. Forecasted cash needs by quarter are not required.
- 3. The form should automatically calculate the sum. Forecasted cash needs by quarter are not required.

# Section E - Budget Estimates of Federal Funds Needed for Balance of the Project – Complete Tab 5

- 1. **Click** Anti-Trafficking Program.
- 2. Enter the amount of federal funds to be expended in year one of the project. Click Save.
- 3. Enter the amount of federal funds to be expended in year two of the project (if applicable).
- 4. Enter the amount of federal funds to be expended in year three of the project (if applicable).

# Section F - Other Budget Information – Complete Tab 6

- 1. Enter: Direct Charges Leave Blank.
- 2. Enter: Indirect Charges If Indirect Charges are shown in Tab 2 (Budget Categories), enter the type of Indirect Rate used (Provisional, Predetermined, Final, or Fixed).
- 3. Enter any comments.

### SF-424B

This form must be signed online in **SAMS Domestic**. Please note, the SF-424B is now required only for those applicants who have not registered in SAM.gov or recertified their registration in SAM.gov since February 2, 2019 and completed the online representations and certifications.

#### **Key Information and Project Narrative**

Applicants are required to use the project narrative template on SAMS-Domestic. The template automatically complies with the character limit and black-colored 12-point, Times New Roman font.

The project narrative must list the following key information at the beginning of the narrative:

- Country or countries that the project will benefit
- Project Title
- Name of applicant organization
- Name and email address of point of contact for the application (This should be the same contact that is listed on the SF-424 in 8f).
- Funding amount requested in U.S. dollars. If applicants include a cost share it should also be in U.S. dollars. No other figures are requested at this time.
- Project duration in months.

The remaining area of this section will make up the foundation of the project narrative.

#### **Analysis of the Country Context**

Building off the information provided in the NOFO and demonstrating applicants' expertise in both analysis and country context, this section should explain the problem or problems that this project will solve, including any background on the country, its institutions, and power structure analysis relevant to the project (who is in charge, do they have power to effect change, who could block the change, are they supported by others etc.). It should also describe ongoing anti-trafficking efforts and how this project will fit into existing efforts. It should detail what has been done to assess the problem(s), including all possible facets of why what we are trying to achieve is not happening now. (This could include prior discussions with people in country, a completed assessment, a prior desk or literature review, discussions with host government personnel, etc.). If the project could benefit from additional analysis before project activities commence, please explain why currently available information is insufficient in this case, outline the primary questions the analysis would seek to answer, identify necessary data sources to answer those questions, and provide an estimated budget and timeline for completion.

#### **Project Description**

This section will provide a theory of change (goal(s) and objectives) summary, including an explanation (under Analysis of the Project) of why the goal is feasible and the objectives are necessary and sufficient to reach the goal. Applicants may suggest alternative objectives to meet the goal, with a justification, if they feel a change is necessary. Please review the attached Program Design Standards guidance and ensure the project description aligns to those concepts.

#### **Setting a Project Goal**

The **goals** section lays out the goal(s) of the project in terms of change the project will bring about. The goal statement should be clear: it should state specific accomplishments, define ambiguous terms, and define the target population.

Words like "increase," "strengthen," "improve," and "enhance" etc. should be avoided or clearly defined. When describing "training or capacity building" describe the concrete knowledge and skills the project will impart.

The stated goal(s) should also be feasible, i.e., possible to reach in the given context with the allotted time and resources.

#### Objectives, Activities, and Performance Indicators

this section should, elaborate the **objectives**, including sub-objectives, under the goal(s) described above in terms of changes that are needed, they also should also be clear, as defined above.

Provide descriptions under each objective of **activities** the applicant will undertake to achieve the objective. Note the main activities that will need to occur to bring about each objective/sub-objective in the template below. In the narrative section, provide evidence why that kind of activity is likely to bring about the desired change and discuss dosage. Identify who has power to support or block reaching relevant objectives and discuss how the activities will engage those people. Include a Gantt chart or other means of conveying anticipated timelines for key activities.

For each objective, please include illustrative, collectible indicators. The successful applicants will have an opportunity to revise indicators when finalizing the logic model and monitoring plan. The purpose of including indicators at this stage is to assess bidders' monitoring capacity.

#### **Analysis of the Project: Effective Theory of Change and Activities**

This section is meant to demonstrate your objectives and activities are likely to be effective, necessary, and sufficient to meet the goal given the country context, choice and dosage of activities, targeted audience, amount of funding, personnel dedicated to the project and time allotted. Justify your choices briefly and explain why the project should meet its goal, using the criteria above at a minimum.

Note: Most goals should be sustainable. For goals intended to be sustainable, planning for sustainability should be reflected in the objectives and activities. Use this section to explain how the project will pursue sustainability. In a limited number of cases, the goal need not be sustainable. In that case, explain why sustainability should not be built into the project's design. If you are proposing additional analysis before finalizing project design, describe how you anticipate that information will inform potential revisions to the design.

#### **Risk Planning**

Identify those facts about the operating environment that are true at the time of the proposal and will need to stay true for the project's logic to remain valid. How likely is it each will remain true? What are the implications if they do not? Based on that analysis, how risky is the project from the perspective of whether or not it will meet its goal?

Separately, describe how the project could cause inadvertent harm and how the project and implementation strategy are designed to mitigate that risk. If applicable, describe the safety and security risk of personnel involved in implementing the project and how that risk will be mitigated.

# **Graphs/Charts**

Applicants may include one additional page for any graphs, charts, and/or logos that are not included in the project narrative. Additional annexes beyond one page are unallowable and will result in failure of the technical review.

If the applicant chooses to submit this additional page, please ensure that all criteria listed above are still followed.

## **Key Personnel**

Key personnel are individuals with primary responsibilities for implementing the strategy outlined in the technical approach. In this section, applicants should Identify and outline the roles and responsibilities of key personnel working on the

project. This may include, but is not limited to, hiring staff, drafting materials, scheduling meetings, coordinating trainings, drafting awareness materials, etc.

- List the qualifications required for each of the key personnel working on the project. This may include, but is not limited to, prior experience in the country, experience working on human trafficking programs, experience with M&E, an understanding of anti-trafficking policies, etc.
- Provide resumes for key personnel already selected to work on the proposed project. If the key personnel selected to work on the proposed project will also be working on another TIP Office project that is already being funded, please provide the time commitments for both the existing project and proposed project.

#### **Organizational Capacity & Partnerships**

In this section, organizations should demonstrate how their resources, capabilities, and qualifications enable them to achieve the proposed goals and objectives in their proposal. Applicants should describe their relevant programming experience and human trafficking expertise, if any. Applicants should highlight the experience and expertise of any individual members of the organization's leadership team who will not be designated key personnel and how they will support accomplishment of program goals and objectives.

Applicants may partner with other organizations in submitting proposals. Each application must clearly identify the applicant, and the applicant may designate one or more partner organizations as sub-recipients. If an applicant applies for an award under this funding opportunity with partner organizations, this section must demonstrate a partnership approach that clearly delineates the respective roles and responsibilities of the applicant and of each partner. Applicants should submit a copy of any signed partnership agreements. All letters of partnership from intended sub-recipients must be submitted in English. Other letters of endorsement may be submitted in a foreign language with an informal English translation.

#### **Considerations**

Applicants are expected to submit proposals that reflect an understanding of victim-centered, trauma-informed, and survivor-informed approaches to anti-trafficking activities.

#### Victim-Centered Approach

Placing the crime victim's priorities, needs, and interests at the center of the work with the victim; providing nonjudgmental assistance, with an emphasis on self-determination, and assisting victims in making informed choices; ensuring that restoring victims' feelings of safety and security are a priority and safeguarding against policies and practices that may inadvertently re-traumatize victims. A victim-centered approach should also incorporate a trauma-informed, survivor-informed, and culturally competent approach.

#### Trauma-Informed Approach

A trauma-informed approach recognizes signs of trauma in individuals and the professionals who help them and responds by integrating knowledge about trauma into policies, procedures, practices, and settings. This approach includes an understanding of the vulnerabilities and experiences of trauma survivors, including the prevalence and physical, social, and emotional impact of trauma. A trauma-informed approach places priority on restoring the survivor's feelings of safety, choice, and control. Programs, services, agencies, and communities can be trauma-informed.

### Survivor-Informed Approach

A program, policy, intervention, or product that is designed, implemented, and evaluated with intentional leadership, expertise and input from a diverse community of survivors to ensure that the program, policy, intervention, or product accurately represents their needs, interests, and perceptions.

#### **Logic Model**

Applicants are required to use the logic model template in **SAMS-Domestic**. The logic model must be presented in Microsoft Word with black-colored 12-point, Times New Roman font.

A Logic Framework demonstrates the causal relationship between the project goals and objectives and the activities undertaken to achieve them. Applicants should include and clearly define output and outcome indicators. Applicants must set targets for each indicator in the logic framework (and in Common Performance Indicators). Recipients will be able to revise indicators and targets during project implementation, when relevant. If a target cannot be set until a baseline is complete, the applicant must clarify what date the target will be set. Output indicators measure the direct products or services derived from completion of the activities proposed in the technical approach. Outcome indicators demonstrate the results a project intends to achieve (e.g., enhancements to victim services, quality of legislation drafted, effectiveness of training materials developed, etc.). The required format and a sample logic framework are included in the Additional Documents to be Submitted section on SAMS Domestic. The approved logic framework will be used to measure performance of projects chosen by the TIP Office for award. Applicants should be realistic in their selection of indicators.

#### **Timeline**

Applicants are required to use timeline template on **SAMS Domestic**. The timeline must be submitted in 12-point Times New Roman font.

Applicants must provide a timeline in the form of a Grant chart to demonstrate the relationship between planned activities such as marshalling other donor resources, conducting open and competitive competitions for grant funding, and conducting timely implementation of sub-awards. The Additional Documents to be Submitted Section includes a timeline template.

Applicants who choose to use the attached template may need to make adjustments to tailor the listed duration and number of listed activities to match those of proposed projects:

- Applicants should rename "Project Title" and "Organization Name."
- Applicants should rename "Activity 1," "Activity 2," etc., as needed to match the proposed project activities and listed the individual responsible for each activity.
- Applicants should fill in the proposed start dates for each activity in Column B, and fill in the columns to reflect the amount of time to be spent on the activity.

#### **Summary Budget, Line-Item Budget, and Budget Narrative**

Applicants should use the required templates for each budget on **SAMS Domestic**. The budgets must be presented in Microsoft Word or Microsoft Excel with black-colored 12-point, Times New Roman font.

The budget must be presented in the three separate formats described below: Budget Summary, Line-Item Budget, and Budget Narrative. The three budget formats must be submitted in separate documents to be considered for funding. If your application has voluntary cost share, please be sure to list it in the appropriate columns as demonstrated below.

Applicants submitting a summary budget, line-item budget, and budget narrative must specify the total amount of funding requested and the amount spent per year and must be in U.S. dollars.

#### **Budget Summary by Project Year**

Provide a summary budget showing totals for the categories listed below for each year of the project. Only include the cost-share column if the requested budget includes voluntary cost-share.

For your convenience, a sample is listed below.

Budget Summary Categories	Year XX	Year XX	Cost Share (if applicable)	Total Federal Funds Requested	Total Cost of Project (includes cost-share, if applicable)
1. Personnel					.,,
2. Fringe Benefits					
3. Travel					
4. Equipment					
5. Supplies					
6. Contractual					
7. Construction					
8. Other Direct Costs					
9. Total Direct Costs (lines 1-8)					
10. Indirect Costs					
11. Total Costs (lines 9-10)					

#### **Line-Item Budget**

A breakdown or spreadsheet showing costs in each of the budget categories listed below, with detailed calculations showing estimation methods, quantities, unit costs, and other similar detail per project year. Any cost-share presented must be broken down according to line items.

Applicants must address the following line-items:

<u>Personnel</u> - For each staff person, provide information such as job title, time commitment to the project as a percentage of full-time equivalent, annual salary (or wage rate), and salary from grant funds.

<u>Fringe Benefits</u> - Provide a breakdown of the amounts and percentages that comprise fringe benefit costs for employees, including health insurance, FICA, retirement insurance, and taxes. List fringe benefit costs separately from salary costs and explain how benefits are computed for each category of employee.

<u>Travel</u> - Identify staff and participant travel, including international airfare, incountry travel, domestic travel in the U.S., and *per diem*/maintenance (includes lodging, meals, and incidentals for both participant and staff travel). Rates of maximum allowance for U.S. and foreign travel are available at <a href="www.fedtravel.com">www.fedtravel.com</a>. *Per diem* rates may not exceed the published USG allowance rates, but applicants may use lower *per diem* rates.

<u>Equipment</u> - For each type of equipment requested, describe the equipment, the cost per unit, the number of units, and the total cost. Equipment is defined as tangible property having a useful life of more than one year and an acquisition cost of \$5,000 or more per item.

<u>Supplies</u> - List items separately using unit costs (and the percentage of each unit cost being charged to the grant) for items such as photocopying, postage, telephone/fax, printing, and office supplies.

<u>Contractual</u> - Provide the costs of all contracts for services and goods, except for those that belong under other categories (such as equipment, supplies, construction, etc.). For each sub-award or contract known at the time of application, provide a detailed line-item breakdown explaining specific costs and services. If consultants will be used in the grant, provide all costs related to their activities, including travel and *per diem* costs.

<u>Construction</u> - Construction costs are defined as non-major costs for rearrangement and alteration or reconversion or renovation of facilities. This includes normal alterations to modify any buildings or grounds, such as replacing doors or painting. Please refer to the funding restrictions on construction under Section 5 "Funding Restrictions".

Other Direct Costs - (These will vary depending on the nature of the grant.) - Provide computations for all other costs. These costs, where applicable and appropriate, may include but are not limited to insurance, food, professional services, space and equipment rentals, stipends, telephone and electricity.

<u>Indirect Charges</u> - Indirect charges are costs that have been incurred for common or joint objectives of an organization and cannot be readily identified with a particular cost objective. These costs are determined by the recipient's accounting system's definition. Generally, a negotiated indirect cost rate agreement (NICRA) is not warranted unless an organization has many U.S. government awards at one time. If applicants do not have a NICRA they can include 10% as indirect costs. Organizations that do not have a NICRA will not be disqualified or penalized.

#### **Budget Narrative**

The budget narrative must be presented in Microsoft Word with black-colored 12-point, Times New Roman font.

This section is a brief, two-to-three sentence explanation of each line item that justifies identified costs.

Please expand on the line-items listed below in the budget narrative.

<u>Personnel</u> - Identify staffing requirements by each position title with a brief description of duties, percentage of time dedicated to the project(s), work locations and other justifications for these costs as they relate to the project.

<u>Fringe Benefits</u> - Provide an explanation of fringe costs and how they are calculated.

<u>Travel</u> - Provide a description of travel costs, including the purpose of the travel, how the travel relates to the project, and who will be traveling under these costs.

<u>Equipment</u> - Provide justification for any planned equipment purchase/rental for the project. Note that equipment is defined as tangible property having a useful life of more than one year and an acquisition cost of \$5,000 or more.

<u>Supplies</u> - Describe general categories of supplies and their direct use for the project.

<u>Contractual</u> - Describe each contractual or consultant cost and outline the necessity of each for the project.

<u>Construction</u> – Describe each of the construction costs as anticipated during the course of the grant. Please refer to the funding restrictions on construction under Section 5 "Funding Restrictions".

Other Direct Costs - Provide a narrative description and a justification for each cost under this category and describe how the costs specifically relate to this project.

<u>Indirect Charges</u> – Describe the cost rate used to calculate indirect charges.

#### **Negotiated Indirect Cost Rate Agreement (NICRA)\***

This is not applicable to all applicants and is only required for those applicants that have a NICRA.

A Negotiated Indirect Cost Rate Agreement (NICRA) is a document published to reflect an estimate of indirect cost rate negotiated between the Federal Government and a grantee organization, which reflects the indirect costs (facilities and administrative costs) & fringe benefit expenses incurred by the organization that will be the same across all of the agencies of the United States.

Applicants that have a NICRA must submit a copy of the current NICRA between their organization and the relevant U.S. government agency. It should clearly indicate the type of Indirect Rate used (e.g., Provisional, Predetermined, Final, or Fixed).

Not all organizations may have a NICRA and organizations that do not have a NICRA will not be disqualified or penalized. Applicants that do not have a NICRA can include 10% as indirect costs.

#### **Resumes/CVs for Key Personnel (5 pages per resume maximum)**

Resumes and CVs must be presented in Microsoft Word with black-colored 12-point, Times New Roman font. Each resume or CV may be no longer than five pages.

If key personnel have already been identified for the proposed project, applicants must submit the relevant individuals' resume/CVs. Key personnel include the individual position(s) necessary to implement the project, such as a program director or program manager.

Each resume/CV shall include the individual's educational background, current employment status, and previous work experience, including position title, duties performed, dates in position, and employing organizations. The resume should highlight skills relevant to managing the program, including donor coordination, grants management, and anti-trafficking-in-persons expertise.

If the key personnel selected to work on the proposed program will also be working on another TIP Office program or project that is already being funded, please provide the time commitments for both the existing program and proposed program.

#### **Certification of Training Requirement for Victim Assistance Personnel**

This is not applicable to all applicants and is only required for those applicants that provide assistance to trafficking victims. The certification, if applicable, must be presented in Microsoft Word with black-colored 12-point, Times New Roman font.

This is a requirement for programs that provide assistance to trafficking victims, per Section 107A(b)(1) of the TVPA.

Applicants must submit an attachment that contains the following statement undersigned by an official authorized to submit the proposal:

The applicant hereby certifies that, to the extent practicable, persons or entities providing legal services, social services, health services, or other assistance have completed, or will complete, training in connection with trafficking in persons.

An authorized official is a supervisor that oversees and manages the staff working with victim assistance in the country and/or region.

Please note, the selected recipient of a TIP Office award is responsible for ensuring the Certification of Training requirement for all sub-awards, if applicable.

# **Letters of Intent to Cooperate\***

This is not applicable to all applicants and is only required for those applicants who propose to partner with one or more stakeholders. The letters should be presented in Microsoft Word or PDF with black-colored 12-point, Times New Roman font.

Applicants that propose one or more partnerships between NGOs, and universities, private sector entities, or governments should submit letters of intent to cooperate, **in English**, from the entity or entities that indicate their willingness to form a partnership for the purposes of the program.

Any letters of intent to cooperate from governments may be in another language with a translated copy. Proposals should also highlight letters of commitment of related public or private donor funding as applicable.

#### **Common Performance Indicators**

Applicants are required to use the template provided in **SAMS-Domestic** and submit it as a separate attachment.

Projects require data collection and reporting on specific performance measurement indicators. Performance indicators are used to measure progress toward the achievement of project objectives. They may be expressed as numbers, percentages, or scores.

The following examples illustrate the type of data to collect and report on quarterly in the CPI spreadsheet during program activities:

- Projects designed to raise awareness must be able to estimate the number of people in the target population that are reached and be able to measure changes in awareness among that population. Baseline data must be established prior to implementation of the campaign. Data must be disaggregated by sex and age minor (18 or under) or adult.
- Projects designed to systematize victim-centered investigations and
  prosecutions of trafficking cases by governments through training and
  technical assistance should collect pre- and post-test data on learning
  outcomes that should be tracked separately from the CPI spreadsheet.
  Projects should also collect data at defined intervals following the
  intervention that measure changes in individual behavior and institutional
  performance as the result of the training or technical assistance. Data on
  training participants must be disaggregated by sex, type of personnel, and
  type of training received.
- Projects designed to help governments strengthen trafficking-related laws, policies, and national referral mechanisms must report on the number of changes being made and the changes to institutional performance that result from the intervention.
- Projects designed to improve victim services must collect data on the number
  of trafficking victims served, disaggregated by sex, age minor (18 or under)
  or adult, and the type of victimization (labor or sex trafficking). Baseline
  data on victims may be taken from the data reported in the preceding year's
  annual Trafficking in Persons Report.

## Program Design Standards: An Effectiveness Checklist

#### Introduction:

The Office to Monitor and Combat Trafficking in Persons (TIP Office) is adopting these program design standards to standardize the office's approach to developing the highest-impact interventions possible. Implementing partners should incorporate these standards into any program or project design documents that are part of proposals for TIP Office funding.

Broadly, the design process should answer five basic questions:

- (1) should the TIP Office work on a particular issue;
- (2) what is the specific change within the specified issue that the TIP Office and its implementers seek to create through the project/program;
- (3) is the project/program's theory of change (i.e., goal and objectives) likely to be effective;
- (4) are the activities likely to bring about the changes sought in the goal and objectives; and
- (5) does the project/program plan for risk appropriately?

This document explains the concepts and provides examples to illustrate what meeting and not meeting each standard looks like. The examples are not trafficking in persons specific. They relate to the criminal justice system in general and illustrate the concepts the standards are aiming for.

## The Design Standards are:

- **Alignment:** The project/program fits within the TIP Office policy, strategies, and/or earmarks.
- **Relevance:** The goal addresses a significant need and the activities are likely to bring about the desired changes.
- **Change:** The goal and objectives are desired end states, external to the TIP Office and their implementers, not activities.

- Clarity: All involved have a similar understanding of what the project/program seeks to accomplish and how.
- **Plausibility:** It is reasonable to think that the program/project will achieve the stated goal because: the change pathway or theory of change is *feasible*; the objectives are *necessary and sufficient* to achieve the goal; the activities touch enough people for enough time to bring about the desired change (*dosage*), and; the *risk of failing to meet the goal* has been considered and/or mitigated.
- Maximize Contribution: The goals and objective reflect at least one element of systemic-level or institutional change; there is no assumption individual-level change will lead to institutional change.
- One Concept: Objectives articulate one concept each.
- Target Population: Objectives state the target population central to achieving change and activities engage those with the power to support/prevent the change. Note: target populations could be any defined group including particular police or prosecutor units, a community, a city, or women in X country between the ages of 18-25, etc.

#### Section I: Should the TIP Office and its implementers work on an issue?

#### **Checklist Questions & Associated Standard**

- 1. Does the goal align with TIP Office policy? (Alignment)
- 2. *Is the goal relevant? (Relevance)*

#### Alignment:

The program goal fits within the TIP Office policy and/or area of responsibility. TIP Office programming priorities can be found here.

Example of What Meeting this	Example of What Not Meeting this	
Standard Looks Like	Standard Looks Like	
Goal: Police conduct complex TIP investigations.	Goal: Freedonia reforms tort law.	
Explanation		
Freedonia might really need tort law reform. That is just not what we do.		

#### <u>Relevance – Goal to the Context</u>:

The relevance standard applies at two levels: is the goal relevant to the context and are the activities relevant to the objectives. When trying to determine if the TIP Office should work on a particular issue, it is the first kind of relevance that matters and is discussed here. Activities' relevance to their objectives is discussed in the fourth section on activity effectiveness.

Reaching the goal needs to matter. Of all the problems the TIP Office could work to solve, which should we pick? Our focus is necessarily on the problem that, if solved, would make the biggest difference and is feasible to achieve. (Recall the

plausibility-relevance tension.) Remember to consider the ripple effect of changes in one part of the criminal justice or other government system throughout the full system when considering what might make the biggest difference. Also factor in ongoing host-government and other-donor initiatives. Even if an important problem still exists, if others are actively working on it and there is reason to believe they will resolve it, the TIP Office and its implementers should not focus on the same problem.

Example of What Meeting this	Example of What Not Meeting this	
Standard Looks Like	Standard Looks Like	
Goal: Freedonia regulates cash purchases of real estate.  (Context: Per Global Financial Integrity's 2018 annual report, the majority of illicit money in Freedonia is laundered through the real estate market.)	Relevance of the goal to the context:  Goal: Freedonia regulates cash purchases of cars.  (Context: There was one very high-profile case in which money was laundered through a used-car business. The majority of illicit money in Freedonia is laundered through real estate, however, and this remains unregulated.)	
Explanation		

It is not that tightening up regulations that would have prevented laundering the money through the used-car business is a bad thing to do. It is just not the thing that will have the biggest bang for our buck.

# Section II: What change on the issue does the TIP Office and its implementers seek through this project/program?

#### **Checklist Questions & Associated Standard**

- 3. Is the goal a change? (Change)
- 4. Are all the objectives changes? (Change)
- 5. Is the goal clear? (Clarity)
- 6. Are all the objectives clear? (Clarity)
- 7. Is it clear who needs to change to reach each objective? (Target Population)

#### Change:

The TIP Office and its implementers' projects and programs articulate their goals and objectives as change statements, not activities. A change is a difference (created and or maintained), external to the TIP Office and our implementing partners. An activity is what we do to try and bring about that change. For example, running a training is an activity. The new information or skills participants learn and utilize in practice, is the change. In most cases, the TIP Office and its implementers are seeking to make something true that is not yet true, such as in the below example. In some cases, however, the goal is maintenance. For example, if we want the international community to be guided on an issue by a certain convention and other countries were seeking to update it, maintaining that convention as the guiding document on an issue would count as a "change" because it requires the TIP Office and/or its implementers to convince others to support our position. The defining aspect of this standard is whether it is entirely in the TIP Office and its implementers' control or not that something happens.

Example of What Meeting this	Example of What Not Meeting this
Standard Looks Like	Standard Looks Like
Police conduct complex TIP investigations.	Train 50 police officers in complex TIP investigation techniques.
(Context: police do not conduct TIP complex investigations at the start of the program for a variety of reasons including )	

### **Explanation**

Training is an activity. Just because we offer a training doesn't mean attendees will learn anything, much less change the way they do their jobs. Learning and modifying behavior are changes because they are outside the TIP Office and its implementers direct control. (Note: changes to knowledge and skills are usually necessary but not sufficient to cause behavior changes. For example, building police capacity to conduct complex TIP investigations where they did not originally have it would be a change. But, in most contexts, other aspects of their environment would need to change too before they would adjust behavior. See the necessary and sufficient section in the plausibility standard below.)

#### Clarity:

Everyone involved in the program has a similar understanding of what the project is trying to accomplish and how it will go about doing so. Define terms. Be concrete about the desired changes, avoiding ambiguous terms like "improve" and "strengthen." If you do use an ambiguous term, provide a definition as shown below with the asterisk after the word "robust."

Example of What Meeting this	Example of What Not Meeting this
Standard this Looks Like	Standard Looks Like
Goal: Freedonia signs robust*	Goal: increase Freedonia's capacity to
legislation criminalizing money	counter money laundering.
laundering into law.	
*Robust legislation includes a clear	
statement of all necessary and	
sufficient elements of the crime, the	
basis for civil and criminal asset	
forfeiture, the basis for all necessary	
and appropriate investigative and	
prosecutorial techniques, procedures	
for adjudication, the institution and	
empowerment of a financial	
intelligence unit, and any and all	
provisions and procedures necessary	

for the investigation and prosecution of all modern forms of TOC.

### Explanation

We want everyone to be on the same page. The first goal is pretty clear – we don't just want better legislation drafted, we want it enacted; we don't just want "effective legislation," we explain what legislation would need to include to be effective. The second goal is not clear. Once Freedonian capacity to counter money laundering is increased, what exactly does that look like?

#### <u>Target Population</u>:

The most important element of this standard pertains to the effectiveness of activities and is discussed in detail in Section IV below. This section addresses how to describe those in whom changes are sought. For example, the TIP Office and our implementing partners might interpret broad terms like "police leadership" differently. Part of being clear is being specific in how to describe the actors in each objective.

Example of What Meeting this	Example of What Not Meeting this	
Standard this Looks Like	Standard Looks Like	
Objective: Police investigators in the Complex Crime Unit know how to collect evidence to prove each element of a crime.	Objective: Police know how to collect evidence to prove each element of a crime.	
Explanation		

#### Explanation

The first example specifies which police within the larger police organization we want to learn this skill. The second leaves open the possibility we want all police in the organization to know this. Note: if your project/program only ever works with police in one unit, you can specify this once and do not need to do so in each objective.

## Section III: Is the change pathway likely to be effective?

## **Checklist Questions & Associated Standard**

- 8. *Is the goal feasible? (Plausibility)*
- 9. Does each objective contain just one concept? (One concept)
- 10. Are the objectives necessary and sufficient? (Plausibility)
- 11.Do some of the objectives target systemic changes? (Maximize contribution)

#### Plausibility (Part I – Feasibility, Necessary and Sufficient Changes):

It is reasonable to believe the TIP Offices' implementer can bring about the change necessary to meet the project/program goal. When weighing if something is reasonable, consider the following:

Feasibility: The goal is the desired end state we expect to reach by the end of the project/program. It is not aspirational or a vision statement (which interventions can also have but should be separate from the goal). One way to help ensure this is to keep each objective to one concept, described in the One Concept standard later in this section.

Example of What Meeting this	Example of What Not Meeting this	
Standard Looks Like	Standard Looks Like	
Goal: Freedonian police to establish a Complex Crime Unit by the end of CY 2020. Establishing such a unit includes reassigning staff to it, training reassigned police investigators in complex crime investigation techniques, and including a budget for it in out-year budget requests.	Goal: Rid Freedonia of the scourge of organized crime.  Context: While the political will to address organized crime exists, the criminal organizations are so strong and Freedonia's institutions are so weak there is no chance Freedonia can	
Context: the political will to take these steps exists.	do this by the end of the project in 2020.	
Explanation		

Reaching the first goal is conceivable. There is simply no chance of reaching the second goal given the circumstances.

*Necessary and Sufficient:* An important part of any assessment is the identification of the primary reasons problems exist. In the design phase, the project/program uses this information develop objectives. Overall, the project/program addresses enough of the reasons the goal is not already a true statement that it is reasonable to expect to create change. Remember to consider possible causes of a problem outside the sector your intervention is targeting. For example, though pretrial detention manifests as a problem in prisons, its causes likely involve police and/or courts. The example in the chart below focuses on the necessary and sufficient aspect of plausibility. Note that the information after the asterisks provides definitions and additional context to understand the concept and example.

Example of What Meeting this	
Standard Looks Like	

Goal: Complex Crime Investigation Unit conducts complex investigations\*.

\*A complex investigation is one where police suspect a single act constituted two or more felonies and requires investigatory techniques beyond searching, interviewing, and evidence collection/preservation. These investigations use investigatory practices such as forensic, scientific, and/or digital techniques.

Objective 1: police have the capacity\* to conduct complex investigations.

\*Capacity is knowledge and skills.

### Example of What Not Meeting this Standard Looks Like

Goal: Complex Crime Investigation Unit conducts complex investigations. A complex investigation is one where police suspect a single act constituted two or more felonies.

Objective 1: police have the knowledge and skills to conduct complex investigations.

(Context: police are not conducting complex investigations because they do not know how and are bureaucratically not set up to do so.)

Objective 2: bureaucratic incentives (e.g., promotion criteria) support conducting complex investigations.

Objective 3: police use equipment for electronic data extraction/analysis.

(Context: police are not conducting complex investigations because they do not know how and are bureaucratically not set up to do so. There is relatively low job-turn over so those we train are likely to remain in place. The above would not meet the necessary and sufficient threshold in a context where police did not conduct complex investigations because they are collaborating with criminal networks. If that were one of the reasons the police were not conducting complex investigations, the objectives would need to address that.)

## Explanation

In this case, there are multiple reasons investigators are not conducting complex investigations. To have a shot of reaching our goal, we need to address the main reasons they are not doing these investigations now, not just one of the reasons. If you learned to do something but were dis-incentivized from applying that knowledge in your job, would you change your behavior?

Note: plausibility and relevance serve as counterbalances to each other. It is plausible we will reach easy goals. To merit being our goal, however, they must be both plausible and relevant.

#### Maximize Contribution:

When seeking systemic/institutional change, reflect what will bring about change at that level in the design. Do not assume individual-level changes will create institutional change. This standard comes from research in the peacebuilding world that found just giving people in conflict direct experiences with each other was not enough to change how those groups co-existed. Those desired larger shifts also required efforts that addressed system-level changes, like revising school curricula on how a country's history is taught and ending policies that perpetuate conflict. Applying this concept to a criminal justice context, for example: even if we trained every single corrections officer in a country on how to classify prisoners, if there were not a policy leadership enforced requiring this to actually happen, and the supporting structures/resources to enable it, that country likely would not classify its prisoners despite staff knowing how.

Example of What Meeting this	Example of What Not Meeting this
Standard Looks Like – Maximize	Standard Looks Like – Maximize
Contribution	Contribution
Goal: Police conduct complex investigations.  Objective: Police Institution eliminates the indicator "number of investigations completed" from promotion decision criteria.	Goal: Police conduct complex investigations.  Activity: Implementer trains all police in complex investigation techniques (and does nothing else to try and reach the goal).
Note: while this one objective is not sufficient to reach the goal, it is an example of an institutional-level change that, when combined with other changes such as individual learning, makes it more likely we will reach the goal.	

# Explanation

Training everyone and doing nothing else assumes that individual changes create institutional changes, i.e., that if only everyone knew how to conduct complex investigations, then they would do it. But, usually, people behave the way they do because of a combination of personal factors (e.g., knowledge level) and external factors (e.g., incentives).

# One Concept:

Objectives articulate one concept each. (This standard will not always apply at the goal level.) This supports both clarity and plausibility.

Example of What Meeting this	Example of What Not Meeting this
Standard Looks Like	Standard Looks Like
Objective: Police conduct complex investigations.	Real goal statement from unnamed implementer:
	We aim at "contributing to the legal, judiciary, administrative and policy frameworks for the socio-economic stability, reconstruction, stabilization and peace of the country and its populations, through a systematic reinforcement of the Governmental Rule-of-Law and the promotion of inter-relations between the national Authorities, at central and decentralized levels, and its population, leading to an increased participatory role within a democratic, conducive and peaceful environment, with a dynamic local and national economic, social and cultural development, opened to a global economy, with a pivotal role in" the region.

# Explanation

There are so many changes included in the second statement, it is unclear what the project is really trying to get done. It is also pretty unlikely getting all of that done is feasible.

#### Section IV: Are the activities likely to bring about the desired changes?

### **Checklist Questions & Associated Standard**

- 12. Are the activities relevant to the objectives? (Relevance)
- 13.Is the project's/program's dosage right? (Plausibility)
- 14.Do activities engage the people who have the power to support or block reaching the goal? (Target Population)

#### <u>Relevance – Activities to Objectives:</u>

There needs to be a logical (or evidence-based) connection between the program or project activities we conduct and the change we seek. If the objective is for the target population to learn skills, hands on trainings are more effective than lecture-based trainings. Where there is evidence that informs decisions about what activities to conduct or how to approach them, reference it. Where there is not evidence, note that gap and explain why you think it is logical. This helps inform decisions later about where to focus monitoring and/or evaluation resources.

Example of What Meeting this	Example of What Not Meeting this	
Standard Looks Like: Relevance of	Standard Looks Like	
Activities to Objectives		
Objective: Corrections officers have defensive tactics skills.	Objective: Corrections officials have defensive tactics skills.	
Activity: Training in which officers physically practice the tactics in conditions similar to those in which they work.	Activity: PowerPoint based training.	
Explanation		

#### Explanation

There needs to be a logical connection between the kinds of change we are trying to create and how we go about doing it. Solely reading about how to do something physical is not the same as trying it out yourself.

### <u>Plausibility – Part II (Dosage)</u>:

The number of people the implementer's intervention touches and the intensity of that touch should be sufficient to bring about the degree of change sought. This is called dosage. For example, to change how a police unit with 500 investigators operates, how many investigators need to be trained? How in-depth of a training is necessary for the unit as a whole to change how it conducts investigations?

# Example of What Meeting this Standard Looks Like

Objective: Police in the Complex Crime Unit conduct effective complex investigations. Effective means: (1) police dedicate appropriate resources to crimes of significance to the community; (2) police make strategic decisions about how best to address the crimes, including whether to be proactive or reactive and whether to handle them as individual cases or as part of a system; (3) police select the investigative tools most appropriate to that strategy; and (4) police use the tools lawfully to generate admissible evidence.

Activity: Provide 400 hours of training to 45 police in the unit.

Context: There are 50 police in the unit. They have decent foundational skills but no exposure to complex crime investigation techniques.

# Example of What Not Meeting this Standard Looks Like

Objective: Police in the Complex Crime Unit conduct effective complex investigations. Effective means: (1) police dedicate appropriate resources to crimes of significance to the community; (2) police make strategic decisions about how best to address the crimes, including whether to be proactive or reactive and whether to handle them as individual cases or as part of a system; (3) police select the investigative tools most appropriate to that strategy; and (4) police use the tools lawfully to generate admissible evidence.

Activity: Train police in complex crime.

Context: There are 50 police in the unit. They have decent foundational skills but no exposure to complex crime investigation techniques.

# Explanation

The first example lets you know the universe of people who will need to operate differently and how many the training seeks to touch. In this case, the design assumes it will not be possible to train all of them but that if 85 percent know the

new techniques, that will be enough to establish new norms for how investigations work in the unit. This example also specifies how much training we think they will need. The second example does not give you the information needed to judge if the project's dosage is right or not.

# **Target Population:**

Objectives state the target population central to achieving change and activities engage those with the power to support/prevent the change.

Example of What Meeting this	Example of What Not Meeting this
Standard this Looks Like	Standard Looks Like
Goal: Investigators in Complex Crime Investigation Unit conduct complex investigations.  Objective: Budget and HR Directors know investigating complex crimes is a priority for the Police Commissioner.	Goal: Police conduct complex investigations.  Activities: bring police (detectives or otherwise) on study tours (without other activities that engage the decision makers).
Activities: Engage the Police Commissioner and X, Y, and Z individuals known to influence her decision-making to convince them of the need for their police to prioritize tackling complex crime.	
Note: these activities are not a comprehensive list of everything needed to bring about the change of police conducting complex investigations. Rather, they highlight that, in a context where police are not conducting such investigations because they lack the resources and are not incentivized to do so, reaching the goal will require convincing those who hold	

the purse strings its worth reaching the goal.

## Explanation

We need to understand who has the power to support/block the change we are seeking. This is linked to the analysis of what is causing the problem. In a context where the main impediment to police conducting complex investigations was their own belief such crimes were not the priority, the project would need to change that perception and police detectives would be the right target for that change. But, in a context where their behavior is driven primarily by bureaucratic incentives, those conducting the investigations are not the only targets. We also need to engage the people who set those bureaucratic incentives.

### Section V: Are we planning for risk appropriately?

#### **Checklist Questions & Associated Standard**

- 15. How likely is it we will fail to meet our goal? Are we comfortable with that level of risk? (Plausibility)
- 16. Has the project/program considered how it might cause inadvertent harm and are appropriate mitigations built into the design? (Minimize Risk)

#### <u>Plausibility – Part III (Risk of not achieving our goal):</u>

There are different kinds of risk. Auditors sometimes ask how we assess and mitigate risk related to achieving our objectives. There is also the risk of inadvertently causing harm. Plausibility can help us think through the former in the design stage. (Note: GAO recommends addressing this kind of risk in monitoring.)

A design is not plausible or implausible on its own – it is always in relation to the context in which the project/program will run, and those contexts change. In a context in which the U.S. government is the main donor, it may be reasonable to assume we might be able to leverage that into applying pressure on a government to undertake necessary reforms. If another donor, particularly with competing policy objectives, were to become active, that would change the context and could change whether a project/program remained plausible. Would we still have the influence necessary to motivate the government to reform? When assessing the risk of achieving objectives, articulate what is true at the start of the project that needs to stay true for the design to stay plausible. Then determine how likely it is those factors will remain unchanged. If the context is unstable and those factors likely will change, the design is higher risk.

#### Example of Assessing and Mitigating Risk

If our program had been asked to develop an emergency response capacity in a country without nation-wide phone coverage but with credible plans to create coverage, starting an emergency response program would be risky. If the country does not install the envisioned cell towers, the investment might be wasted. There might be valid reasons for wanting to take this risk, however. If this were a priority for the country, partnering with them on it could be valuable for the overall bilateral relationship. Consider how likely it is the government will keep expanding phone coverage and how beneficial the potential return on investment would be vice how detrimental a wasted investment would be.

Questions such as the following can help in assessing the likelihood and consequence of possible failure: Does the government tend to follow through on commitments? Have they completed early steps in the process such as securing the budget? If the cell towers never materialize, what would become of the equipment we donated? If it would be largely wasted, what are the consequences of that?

#### Minimize Risk: Do no harm

Projects/programs should consider the ways in which they might inadvertently cause harm. Specifically, consider:

- Will participants be at risk or in danger because of their involvement in the program?
- Could this program undercut other U.S. policy priorities in the bilateral relationship or otherwise harm U.S. national security interests?
- Could equipment/resources be diverted from their intended purpose? What, if any, impact might this have on ongoing violence/corruption?
- How does the allocation of assistance map along conflict lines? If one party to a conflict will receive more resources, what, if any, impact will that have on the broader conflict?
- Will the program promote new people/groups into leadership roles? If so, what impact do we think that will have, including how do we think they will use their new power?
- Is the assistance such a large percent of the local economy that we need to understand how we are affecting local and informal markets?

If you think there is a risk the program might cause inadvertent harm, are there steps you can take to prevent the harm? For example, if you were concerned a host government might react to an anticorruption program by accusing the embassy of taking sides in internal politics, you might invest more time to educate diverse stakeholders on the criteria the anticorruption agency will use when deciding where to direct investigation resources. Or, if you are particularly concerned donated vehicles might become personal perks, you might plan from the outset to have some form of public accountability for how the police use the cars. For potential risks where there is no change you would make to the program design to mitigate it, you can address those through monitoring.

# Example of What Meeting this Standard Looks Like – Minimize Risk

Example of What Not Meeting this Standard Looks Like – Minimize Risk

Objective: Freedonian police use wiretaps to build cases against criminals.

Goal: Police conduct complex investigations.

Activity: We provide wiretap technology, training, *and* support to develop accompanying policies and procedures for use and oversight. We sequence this such that the policies are in place before we procure the equipment and ensure the implementer understands the importance of this.

Activity: We provide intense training and mentoring to a select group of police who will begin taking on the biggest organized crime cases in the country. It is such a successful program, we post about it on Facebook (including great trainee action shots).

Context: Freedonia wants to use wiretaps to go after bad guys. It is unclear if that's all their leaders would use them for.

#### Explanation

In the first example, we identify a risk and builds mitigation plans into how we conduct the activities. In the second example, we needlessly make it easier for bad guys to target our partners.